

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**DECLARATION OF ALEXANDER D. WALL IN SUPPORT OF  
RECEIVER'S HEARING BRIEF**

I, Alexander D. Wall, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am counsel to Thomas W. McNamara, the Court-appointed receiver ("Receiver"), in the above-captioned action. I have personal knowledge of the facts set forth in this Declaration and if called as a witness, I could and would competently testify to the facts stated herein.

2. I submit this Declaration in connection with the Receiver's Hearing Brief.

3. Attached hereto as Exhibit 1 is a true and correct copy of a December 12-13, 2022 email thread having the subject line "Re: Bonus".

4. Attached hereto as Exhibit 2 is a true and correct copy of an April 3, 2023 email with a blank subject line.

5. Attached hereto as Exhibit 3 is a true and correct copy of an October 31, 2023 email having the subject line "Jenni Moy Raise Request".

6. Attached hereto as Exhibit 4 is a true and correct copy of a December 4, 2023 email thread having the subject line “Re: Employees”.

7. Attached hereto as Exhibit 5 is a true and correct copy of a Confidential Settlement Agreement and Mutual Release, dated August 31, 2021.

8. Attached hereto as Exhibit 6 is a true and correct copy of a March 14-22, 2022 email thread having the subject line “RE: Audit – Carolina settlement”.

9. Attached hereto as Exhibit 7 is a true and correct copy of a March 17-23, 2022 email thread having the subject line “RE: Carolina Settlement 1.5M”.

10. Attached hereto as Exhibit 8 is a true and correct copy of a December 27, 2021 email thread having the subject line “RE: 2021 Law Firm Bills”.

Executed this 16th day of January, 2025, in San Diego, California.

/s/ Alexander D. Wall  
Alexander D. Wall